

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MINALEAH A. KOFFRON,  
Plaintiff,

Civil Action No. 23-0168-CD  
Hon. Curtis J. Bell

v.

District Court Case No: \_\_\_\_\_

PORTAGE PUBLIC SCHOOLS,  
MARK BIELANG, Superintendent and  
NATHAN A. LEDLOW, Interim Principal  
Of Portage Northern High School (in  
their individual and governmental capacities).

Defendants.

Marla A. Linderman Richelew (P55759)  
LINDERMAN LAW PLLC  
Attorneys for Plaintiff  
531 Woodgrove Drive  
Ann Arbor, MI 48103  
(810) 220-0600  
Email: [lindermanlaw@sbcglobal.net](mailto:lindermanlaw@sbcglobal.net)

Mark T. Ostrowski (P49761)  
Jessica M. Stark (P80647)  
KLUCZYNSKI, GIRTZ & VOGELANG  
Attorneys for Defendants  
3033 Orchard Vista Dr. SE, Ste. 308  
Grand Rapids, MI 49546  
(616) 559-8649  
Email: [marko@kgvlaw.com](mailto:marko@kgvlaw.com)

**NOTICE OF REMOVAL OF CIVIL ACTION**

TO THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE WESTERN  
DISTRICT OF MICHIGAN:

NOW COME defendants, Portage Public Schools, Mark Bielang and Nathan A.  
Ledlow, and for their Notice of Removal, pursuant to 28 U.S.C. § 1446, respectfully  
show as follows:

1. On or about March 27, 2023, plaintiffs commenced an action against  
these defendants in the Circuit Court for the County of Kalamazoo, State of Michigan,  
entitled *Minaleah A. Koffron v Portage Public Schools, Mark Bielang, Superintendent*

and Nathan A. Ledlow, Interim Principal of Portage Northern High School, (in their individual and governmental capacities), and bearing Case No: 23-0168-CD and assigned to the Honorable Curtis J. Bell. A copy of the Complaint and other pleadings filed in these proceedings by plaintiff are attached hereto. These defendants have not filed an Answer to plaintiff's Complaint.

2. Plaintiff's Complaint alleges in Count III that defendants have violated plaintiff's federal constitutional rights set forth in the First Amendment of the United States Constitution applicable to the states through the 14<sup>th</sup> Amendment.

3. Pursuant to 28 U.S.C. § 1331, this Court has original jurisdiction over plaintiffs' claim asserting violations of the First and Fourteen Amendments to the United States Constitution. As a result, these defendants may remove plaintiff's entire Complaint to this Court pursuant to 28 U.S.C. § 1441(a), (b) and (c).

4. These defendants have filed this Notice of Removal within 30 days after defendants' first receipt of plaintiff's Complaint. There are no non-school district defendants not represented by the undersigned counsel.

WHEREFORE, the removing parties pray that the above-entitled action be removed from the Kalamazoo County Circuit Court to this Court.

KLUCZYNSKI, GIRTZ & VOGELZANG

Date: March 30, 2023

By: 

Mark T. Ostrowski (P49761)  
Attorneys for Defendants  
3033 Orchard Vista Dr. SE, Ste. 308  
Grand Rapids, MI 49546  
(616) 559-8649